

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

KENNETH S. BANNING, JR., PLAINTIFF, v. ALIN AUGUSTIN MASCA AND MAHAI DORU POP, DEFENDANTS.	C.A. NO. 08-00001 GMS TRIAL BY JURY DEMANDED
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REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANTS

AND NOW, comes the Plaintiff above named who does request Defendants produce the following within thirty (30) days of the date of service.

1. Any and all regulations in effect between the defendants regarding the operation of the vehicle involved in the incident of November 4, 2005.
2. The complete personnel file of Alin Masca.
3. All investigation into and vetting of driver Alin Masca by co-defendant Mahai Doru Pop prior to the incident of November 4, 2005 with regards to his qualifications to operate a tractor trailer.
4. A copy of any and all documentation concerning prior incidents and/or accidents, prior citations and/or motor vehicle code violations and/or other history which would impact on driver Masca's abilities as a driver.
5. A copy of the trip logs relating to the week prior to the incident of November 4, 2005 including the date of the incident, November 4, 2005 concerning Alin Masca.
6. Any and all incident reports prepared by you or by anyone else relative to the accident of November 4, 2005.
7. Any documentation concerning any disciplinary hearing, penalties, suspensions

relative to the operation of a vehicle by defendant Alin Masca prior to the incident of November 4, 2005.

8. Any and all documents defendants intend to use at time of trial.

ROBINSON GRAYSON DRYDEN
& WARD

A handwritten signature in black ink, appearing to read 'Stephen F. Dryden', is written over a horizontal line.

STEPHEN F. DRYDEN, ESQUIRE

Bar I.D. No. 2157

910 Foulk Road, Suite 200

Wilmington, DE 19803

(302) 655-6262

Attorney for Plaintiff

Dated: March 6, 2008